

1 DEBRA ELLWOOD MEPPEN, SBN 183885
dmeppen@grsm.com
2 PETER CHOI, SBN 249482
pchoi@grsm.com
3 MATTHEW T. THERIAULT, SBN 244037
GORDON REES SCULLY MANSUKHANI
4 633 West Fifth Street, 52nd Floor
Los Angeles, CA 90071
5 Telephone: (213) 576-5000
Facsimile: (310) 860-0771

6 Attorneys for Defendants
7 DMA CLAIMS, INC., DMA CLAIMS
MANAGEMENT, INC., VENBROOK GROUP,
8 LLC, and VENBROOK INSURANCE
SERVICES, LLC
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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES – SPRING STRET COURTHOUSE

13 GENNINE MERRITT, individually, and on a
14 representative basis, and on behalf of others
all similarly situated,

15 Plaintiff,

16 vs.

17 DMA CLAIMS, INC.; a California
18 Corporation; DMA CLAIMS
MANAGEMENT, INC.; an Illinois
19 Corporation; VENBROOK GROUP, LLC; a
20 Delaware Limited Liability Company; and
VENBROOK INSURANCE SERVICES,
21 LLC, a California Limited Liability Company;
and DOES 1 through 20, inclusive;

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23 Defendants.
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Case No.: 21STCV31200

[Assigned for all purposes to the Hon. Stuart
Rice, Dept. 1]

CLASS ACTION

**DECLARATION OF DEFENDANTS'
COUNSEL MATTHEW T. THERIAULT
IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: December 12, 2022
Time: 10:00 a.m.
Dept: 1

Complaint Filed: August 24, 2021
Trial Date: None.

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DECLARATION OF MATTHEW T. THERIAULT

I, Matthew T. Theriault, declare:

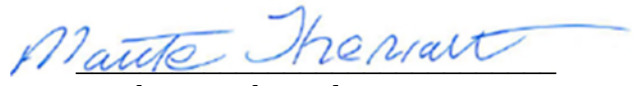
1. I am a citizen of the United States and am over the age of 18. I make this declaration in connection with Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I am Defendants' counsel of record in this matter and a member of my firm's employment group.

2. I am responsible for and handle a number of employment cases brought as class actions or representative actions under PAGA. Phoenix Class Action Administration is one notice administrator among many that our firm has agreed to allow the administration of Belaire-West notice, class notice and notice of settlement following approval. My firm has no financial interest in Phoenix, and I know of no facts that would constitute any collusion or conflict of interest in this regard.

3. I also know of no other lawsuits with claims against Defendants that potentially overlap with the wage and hour claims that are being settled in this lawsuit.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. In this

Executed this 16th day of November, 2022 at Pasadena, California.


Matthew T. Theriault